



Global Wireless Solutions

International Telecommunications Consulting Services

EX PARTE OR LATE FILED

December 24, 1997

The Honorable William Kennard
Federal Communications Commission
1919 M Street, NW
Room 814
Washington, DC, 20554

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Dear Chairman Kennard:

Global Wireless Solutions (GWS) was founded in 1996 to provide high quality engineering services, comprehensive management services and related products to the wireless industry on a worldwide basis. At the time of our founding, the auctions for the A, B and C band PCS licensees had concluded. The D, E and F block actions were soon to begin. There was much excitement in the industry as it was anticipated that networks for six new PCS operators would soon be under construction throughout the United States. These new operators would require highly skilled engineering and management personnel for successful commercialization. It was expected that Global Wireless Solutions would play a significant role in assisting the PCS operators and infrastructure vendors turn this dream into a reality. Almost a year and a half later that dynamic has been substantially altered.

Global Wireless Solutions would like to express support for those companies that have asked the Commission to improve upon the restructuring options available to C block licensees. We are concerned that the decision reached by the Commission in September 1997 will not be effective in restoring the vitality of the overall PCS market. This vitality is dependent upon the entrants into the PCS market having a relatively even playing field in terms of the cost of spectrum and time to market. The recent actions of the FCC did not reshape the value propositions of the major C Block licensees. We fear that this will have the effect of continuing to delay the placing into service of many PCS licenses. This will affect the American public in general by denying them the level of competition originally envisaged, and will adversely affecting many C Block licensees as well as many smaller businesses serving the PCS industry.

Since the Commission adopted its order implementing the Congressional mandate to ensure minority and women-owned business, small business, and rural telephone company participation in the future PCS industry, the history of the C Block has been one of continual evolution. Subsequent to adopting its first PCS rules, the Commission modified the PCS spectrum allocation, changed and amended the C and F block eligibility



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rules, and adopted an auction schedule that placed the A and B block auctions ahead of the C Block, but before the D, E, and F block auction, altered the terms of the F block installment payments immediately following the C Block auction, and delayed the grant of contested C Block licenses by a number of months that exceeded the combined length of time it took to grant contested A, B, D and E licenses. Simultaneous with the grant of the final contested license, the Commission initiated six months of debate on the state of C Block financing, and now has adopted an order that does not appear to have the support from the major C Block licensees.

The overall health of the PCS segment of the wireless industry will benefit by actions that may be taken by the Commission to speed the C block licenses' entry into the competitive marketplace. Ample precedent clearly exists for further changes, as evidenced by the evolution referred to earlier. The survival and growth of Global Wireless Solutions is significantly dependent upon providing our services to support the build-out of the major domestic United States PCS markets. We urge you to reconsider your decision, to continue the evolution which will provide C Block licensees and their suppliers with a regulatory environment that will allow them to change the landscape of wireless competition, without additional delay.

Sincerely,

Paul Carter
President
Global Wireless Solutions

cc: The Honorable Susan Ness
The Honorable Harold Furchtgott-Roth
The Honorable Michael Powell
The Honorable Gloria Tristani
Mr. Daniel Phythyon
Ms. Sandra Danner
Ms. Magalie Roman Salas